

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SUZANNE SCOTT and
FOX NEWS NETWORK, LLC,

Case No.

Movants,

v.

For an Action Pending in the United
States District Court, for the Southern
District of West Virginia; 2: 19-cv-00236

DON BLANKENSHIP,

Respondent.

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**NON-PARTY SUZANNE SCOTT’S NOTICE OF MOTION TO
QUASH SUBPOENA AND FOX NEWS NETWORK, LLC’S
MOTION FOR PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 45, Non-Party Witness Suzanne Scott hereby moves to quash, and pursuant to Federal Rule of Civil Procedure 26 and 30, Fox News Network, LLC moves for a protective order with respect to a subpoena (“Subpoena”) seeking deposition testimony and production of documents in New York, New York for a civil action captioned *Don Blankenship v. Fox News Network, LLC, et al*, No. 2:19-cv-00236 (S.D. of W. Va.). As discussed further in the attached memorandum of law in support of this motion, the Subpoena should be quashed, and a protective order should be entered because the Subpoena, which was served months after the close of fact discovery, seeks discovery that is not “necessary,” is not relevant to resolve the issues in the litigation, and constitutes an undue burden.

Opposition, if any, shall be filed on October 22, 2021, by stipulation of the parties.

October 19, 2021

Respectfully submitted,

/s/ Shawn Patrick Regan

Shawn Patrick Regan

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Counsel for Movants
Non-Party Witness Suzanne Scott
and Fox News Network, LLC

CERTIFICATE OF SERVICE

I, Shawn Patrick Regan, counsel for Movants, hereby certify that on October 19, 2021, I caused a true and correct copy of the foregoing Notice of Motion to Quash and for Protective Order and the supporting papers to be served by email upon counsel for the Respondent:

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